

Case Name: Lorena Dominguez v. USA

Case Number: 1:23CV - 07908 (_____) (PK)

PROPOSED DISCOVERY PLAN/SCHEDULING ORDER

| | DONE | NOT APPLICABLE | DATE |
|--|-------------|---------------------------|-------------|
| A. ACTIONS REQUIRED <i>BEFORE</i> THE INITIAL CONFERENCE | | | |
| 1. Rule 26(f) Conference held | XX | | |
| 2. Rule 26(a)(1) disclosures exchanged | XX | | |
| 3. Requested: | | | |
| a. Medical records authorization | XX | | |
| b. Section 160.50 releases for arrest records | | XX | |
| c. Identification of John Doe/Jane Doe defendants | | XX | |
| 4. Procedures for producing Electronically Stored Information (ESI) discussed | | XX | |
| 5. Confidentiality Order to be submitted for court approval (see Standing Confidentiality Order on the Chambers website) | | | 11/11/2024 |
| B. SETTLEMENT PLAN | | | |
| 1. Plaintiff to make settlement demand | XX | | |
| 2. Defendant to make settlement offer | | | 2/3/2025 |
| 3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date for mediation to be completed) | | XX | |
| 4. Settlement Conference (proposed date) | | | 3/3/2025 |
| C. PROPOSED DEADLINES | | | |
| 1. Motion to join new parties or amend pleadings | | XX | |
| 2. Initial documents requests and interrogatories | | DONE | |
| 3. All fact discovery to be completed (including disclosure of medical records) | | DONE | |
| 4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed | | DONE | |

| 5. Expert discovery (only if needed) | | <i>Check here if not applicable</i> <input checked="" type="checkbox"/> | |
|--|---|--|----------------|
| Plaintiff expert proposed field(s) of expertise: | | Various treating medical experts, life care planner, economist, and reserve rights to others | |
| Defendant expert proposed field(s) of expertise: | | Medical and accident reconstruction experts and reserves right to identify others | |
| | | DONE | NOT APPLICABLE |
| a. | Affirmative expert reports due | | 1/13/25 |
| b. | Rebuttal expert reports due | | 2/11/25 |
| c. | Depositions of experts to be completed | | 3/28/25 |
| 6. | Completion of ALL DISCOVERY (if different from C.3) | | 04/01/25 |
| 7. | Joint status report certifying close of ALL DISCOVERY and indicating whether dispositive motion is anticipated | | 04/23/2025 |
| 8. | If any party seeks a dispositive motion , date to (a) file request for pre-motion conference (if required), or (b) file briefing schedule for the motion | | 04/23/2025 |
| 9. | Proposed Joint Pre-Trial Order due (if no dispositive motion filed) | | 05/08/2025 |

D. CONSENT TO MAGISTRATE JUDGE JURISDICTION

| | |
|---|--|
| 1. All parties consent to Magistrate Judge jurisdiction for dispositive motion? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 2. All parties consent to Magistrate Judge jurisdiction for trial? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY

| | | | |
|---|--|--|--|
| 1. Motion for collective action certification in FLSA cases | | | |
| a. Response due | | | |
| b. Reply due | | | |
| 2. Motion for Rule 23 class certification | | | |
| a. Response due | | | |
| b. Reply due | | | |

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

PEGGY KUO
United States Magistrate Judge

Date